



Environmental Services Department  
4653 Table Mountain Drive  
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June 7, 2004

ADMINISTRATIVE  
RECORD

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### **PSCO COMMENTS ON PARAGON PROPOSED WORK PLAN FOR EPA-REQUESTED ASSESSMENT**

Public Service Company of Colorado (PSCo, d/b/a Xcel Energy) has reviewed the *Paragon Proposed Work Plan For EPA-Requested Assessment* ("Plan") dated June 3, 2004, and offers the following comments:

- ♦ Pg 1, Figure 1 - The three monitoring well locations appear inadequate to fully characterize site impacts for all Site Contaminants of Interest (COI), as previously investigated on the landfill and river properties; specifically NAPLs, petroleum (gasoline and diesel), and solvents. As a minimum, to identify all possible impacts in the alluvium and bedrock along the Willow Street corridor from previous known or suspected releases from the Schrader property, additional soil borings/monitoring wells should be installed. PSCo requests one paired well in the area of MW-12 or MW-14, one paired well in the area of MW-15, and one paired well in the area of MW-7.
- ♦ Any changes in boring locations should be identified to and receive prior approved from all interested parties, e.g. EPA and PSCo.
- ♦ §4,5,6 - As the Schrader property is suspected as a possible source area for both petroleum and NAPL contaminants, all wells should be developed as pairs to address both alluvial and bedrock impacts. The presence and definition vertically and laterally of these contaminants is especially important to properly defining the site conceptual model, which justifies this additional action.
- ♦ §6 - All borings into bedrock should be advanced to ten (10) feet past the last detected contamination, similar to our approach used in the river and landfill areas.
- ♦ §6 - As a lesson learned from the previous site investigations, it is suggested that Paragon evaluate the use of larger screening (0.01-inch slot is listed) to facilitate the flow of more viscous products into the wells.
- ♦ §7 - Borings should be logged for "presence of non-aqueous phase liquids (NAPL) and/or petroleum..."
- ♦ §8 - Clarify that other parties (i.e. PSCo) may take splits of any soil, surface water, ground water, or free product samples. In addition, they should have the right to observe and co-log the soil borings.
- ♦ §9/10 - As part of well development, fluid levels should be measured and recorded for each well. Additionally, fluid levels should be measured on some periodic basis thereafter, in conjunction with measurements taken in other site-wide wells, for the purposes of updated groundwater contour maps.
- ♦ Field Methods, Para. 2 - The last sentence states that wastes "will be containerized, temporarily stockpiled on site, and eventually transported off site for disposal." Note that this material must also be properly characterized prior to disposal.

We would be happy to discuss our comments with you further at your convenience. You can reach me at 720-497-2107 (office) or 303-618-7432 (cell).

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Staley', is written over a horizontal line.

Terry D. Staley  
Manager, Environmental Services  
Xcel Energy

cc: Margit Hentschel (City of Ft. Collins)  
Dennis Alexander (Retec)